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MAR 15 1996

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY**

Hank Brandenburg
Executive Vice President

March 15, 1996

DOCKET FILE COPY ORIGINAL

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20054

DOCKET FILE COPY ORIGINAL

Re: Notice of Inquiry
PP Docket No. 96-17
In the Matter Of
IMPROVING COMMISSION PROCESSES
Comments of Dataworld, Inc.

Dear Mr. Caton:

Transmitted herewith is an original and nine copies of our comments in the above-captioned *Notice of Inquiry*. We have included the additional copies for distribution to the Commissioners. A courtesy copy has also been supplied to the Commission's copy contractor (ITS).

Reply comments in this proceeding may be addressed to:

Hank Brandenburg
Dataworld, Inc.
4833 Rugby Avenue, Suite 300
Bethesda, MD 20814

Sincerely yours,



Hank Brandenburg

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Original

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of

IMPROVING COMMISSION PROCESSES

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PP Docket 96-17

Comments of Dataworld, Inc.

Dataworld hereby submits the following comments in response to the *Notice of Inquiry* in the above-referenced proceeding. Dataworld has been supplying both technical and commercial information services and products to the communications industry, specifically broadcasters, since 1971. It currently maintains a full-time internet connection, dial up modem on line service, and on demand report and map production service utilized by thousands of broadcast industry clients. This long

standing relationship with industry professionals has allowed Dataworld to gain considerable insight into industry trends and attitudes.

In paragraph 58 of the *Notice* the Commission requests comment as to whether the broadcast industry and/or its representatives would like to participate in the development of electronic database administration systems. Dataworld wishes to participate. Further, Dataworld wishes to propose, for further comment, that Commission procedures can be further streamlined by contracting to private industry the computerized evaluation of technical regulatory compliance for broadcast facility applications. Having provided such services for 25 years as a “third party” to FCC applicants has led us to believe that a single, unified source for these services would improve service to the industry.

In the crowded RF spectrum environment that exists today it is common for broadcast facility proposals to be engineered with very little clearance remaining before technical compliance is breached. The applicant, or its technical consultant, often uses the services of Dataworld, which employ both the Commission’s and its own proprietary databases of technical facilities, along with numerous topographic, geographic and demographic databases. Specialized software analyzes facility

proposals and prepares reports detailing potential interference and rule compliance. Once this is completed, the application is submitted to the Commission, where a similar procedure is followed to evaluate the proposal. Besides being an unneeded duplication of efforts, this process can contribute to application processing delays.

In some cases results from the Commission's software may differ from industry sources. Although part 73 of the CFR is quite specific in specifying the technical regulatory mechanisms to be used in evaluating compliance, differences in implementation of the mechanisms can cause disparate results. Variance in computing hardware and computational algorithms are a common source of such discrepancies. Differences between versions of "static" databases, such as topographic, soil conductivity and population, are another source of discrepancy among Commission and industry sources.

A single, Commission-selected contractor is a logical choice for standardization of industry information sources and procedures, specifically regarding computational algorithms and database version control. The contractor could provide application pre-processing services as well as implementation and maintenance of electronic application filing system. An applicant for a new facility or facility upgrade would

submit to the contractor the technical specifics of its proposal, via the internet, dial-up modem or conventional application forms. The contractor would provide to the applicant the details regarding technical compliance of the proposal. Once compliance with technical standards is established, the data items pertinent to the application would be submitted electronically, along with details of the compliance evaluation, to Commission staff for completion of processing. A scanned image of any pertinent documents submitted by the applicant or generated by the contractor would also be transmitted to the Commission. The contractor would also be responsible for distribution of standard algorithms in source code format as well as databases in industry standard formats.

Although electronic submission of applications is currently quite feasible for most of the industry at this time (paragraph 59), Dataworld feels that filing conventional application forms should still be an option to licensees for some time. For conventional (paper) submissions, the proposed contractor would be responsible for inputting the information into electronic data files for processing. The burden of application form (paper) receiving and processing would be completely removed from Commission staff under this proposal, resulting in considerable administrative cost savings. This is consistent with the “doing more with less” guidelines in the *NPR*.

Commission staff would begin processing procedures using data and analysis from the “front end” processing contractor.

A number of other routine tasks would be delegated to this contractor. Calculation of night, pre-sunrise and post-sunset operating power authorizations for Daytime AM stations is a logical choice. The AM broadcast industry, since its inception, has needed an electronic data source for the voluminous measured soil conductivity data filed with AM applications and proof-of-performance certifications. The contractor would create and make available publicly this data, as well as signal propagation and interference calculations based on it. Details of antenna patterns for FM and TV broadcasters could benefit from additional antenna radiation characteristics being available for coverage and interference calculations as well. The contractor would serve as a liaison for technical information between industry manufacturers and those preparing technical submissions.

Paragraph 60 of the *Notice* refers to the broadcast call sign availability and reservation functions. For over 10 years Dataworld has provided call sign availability services to the industry. Interactive, on-line software facilitates reporting of all available call signs. Alternatively, a single call sign or call sign template can be

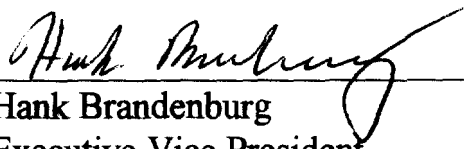
submitted to the software for determination of availability. This is a clear example of how industry information sources have evolved to meet industry needs. The function of handling reservations of specific call signs is a logical extension of this service. Selection of a private contractor for this process would relieve the Commission of the administrative burden currently associated with it, as well as improving service to the industry.

As the Commission continues its improvement and streamlining procedures pursuant to the *National Performance Review and Report on Creating an FCC for the Information Age* guidelines, it follows logically that the Commission look more towards private industry for the efficient, cost-effective performance of routine regulatory processing functions. The Mass Media Bureau regulates a relatively mature industry in terms of technology; therefore, technical procedures are well-established and readily lend themselves to standardization and implementation by an outside source.

Service to the broadcast industry would be improved as a result of privatizing this application technical pre-processing and electronic submission function. Quality of service, response time and accessibility of pertinent information and official technical analysis would create a more user-friendly, customer-service-oriented process.

Although some cost would be incurred by the Commission during transition periods associated with transferring these functions, the ultimate result will be significant administrative cost reductions to the Commission, as the operating costs for these functions would be funded entirely with fees collected by the private contractor from the industry.

Respectfully submitted,


Hank Brandenburg
Executive Vice President

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